

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MARY E. BLOOD, Special)	
Administrator of the Estate of)	
Paul E. Blood, deceased,)	
)	
Plaintiff,)	No.
)	
v.)	(Circuit Court of Williamson County,
)	Illinois, Cause No. 09-L-64)
MILINKO CUKOVIC, and)	
T.E.A.M. LOGISTICS SYSTEMS,)	TRIAL BY JURY DEMANDED
INC., an Ontario Business Corp.,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Come now Defendants, T.E.A.M. Logistics Systems, Inc., and Milinko Cukovic, by their undersigned attorneys, and pursuant to Title 28 USC §§ 1332 and 1441, hereby file their Notice of Removal of the cause entitled Mary E. Blood, Special Administrator of the Estate of Paul E. Blood, deceased, v. T.E.A.M. Logistics Systems, Inc., and Milinko Cukovic, filed in the Circuit Court of the First Judicial Circuit, Williamson County, Illinois, Cause No. 09-L-64.

As grounds for their removal, Defendants state as follows:

1. Plaintiff commenced an action against the above-captioned Defendants on or about April 20, 2009 by filing Plaintiff's Complaint in the Circuit Court of the First Judicial Circuit, Williamson County, in the State of Illinois, under Cause No. 09-L-64.

2. A true and complete copy of the Complaint and Summons served are attached as Exhibit 1.

3. Defendants first received a copy of the Complaint on September 9, 2009, by service.

4. Defendant, T.E.A.M. Logistics Systems, Inc. is a Canadian corporation with its principal place of business in Cambridge, Ontario, Canada.

5. Defendant, Milinko Cukovic, is domiciled in Canada and resides in Kitchener, Ontario.
6. Milinko Cukovic is not a citizen, resident or domiciliary of Illinois.
7. Plaintiff, Mary E. Blood, is a citizen of Illinois, as was decedent Paul E. Blood at the time of his death.
8. Plaintiff brings his action pursuant to Illinois law.
9. Jurisdiction is proper under 28 U.S.C. § 1332.
10. Removal is proper under 28 U.S.C. § 1441.
11. All Defendants join in and seek removal to this Federal Court pursuant to 28 U.S.C. §§ 1332 and 1441.
12. The amount in controversy in this action exceeds \$75,000.00, exclusive of interest and costs, as the action is one for wrongful death.

WHEREFORE, Defendants T.E.A.M. Logistics Systems, Inc., and Milinko Cukovic, file their Notice of Removal, removing the state court action from the Circuit Court of the First Judicial Circuit, Williamson County, to the United States District Court for the Southern District of Illinois, East St. Louis Division.

/S/Ronald A. Roth
Ronald A. Roth #03122075
ROTH EVANS, P.C.
2421 Corporate Centre Dr., Ste. 200
Granite City, IL 62040
#618/931-5000
Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2009, I electronically filed the foregoing **Notice of Removal** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mark D. Hassakis, Esq.
Hassakis & Hassakis, P.C.
206 South 9th Street
P.O. Box 706
Mt. Vernon, IL 62864
#618/244-5335
Attorney for Plaintiff

/S/Ronald A. Roth
Ronald A. Roth #03122075
ROTH EVANS, P.C.
2421 Corporate Centre Dr., Ste. 200
Granite City, IL 62040
#618/931-5000
Attorney for Defendants